

UNITED STATES DISTRICT COURT
 for the
 Western District of New York

United States of America)	
v.)	
Patricia Hutchins)	Case No. 25-MJ-540
)	
)	
)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2022 through December 2024 in the county of Monroe in the Western District of New York, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 1001	Making a False Statement
18 USC 1344	Bank Fraud

This criminal complaint is based on these facts:

See attached Affidavit of USPIS Inspector Clinton E. Homer, which is attached hereto and incorporated herein by reference

Continued on the attached sheet.



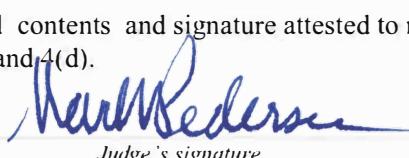
Complainant's signature

Clinton E. Homer, Postal Inspector, USPIS

Printed name and title

Submitted electronically by email in .pdf format. Oath administered and contents and signature attested to me and before me as true and accurate telephonically pursuant to Fed. R. Crim. P.4.1 and 4(d).

Date: March 14, 2025



Judge's signature

City and state:

Rochester, New York

Hon. Mark W. Pedersen

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE) SS:
CITY OF ROCHESTER)

I, CLINTON E. HOMER, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Postal Inspector for the United States Postal Inspection Service stationed at the Buffalo, New York Field Office, and have held such position since July 6, 2005. I am currently assigned to investigate Postal Crimes within the Western District of New York. As a Federal Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. I make this Affidavit in support of an application for a Criminal Complaint charging PATRICIA HUTCHINS with violations of Title 18, United States Code, Section 1001 (Making a False Statement) and Title 18, United States Code, Section 1344 (Bank Fraud) (hereinafter, collectively the “TARGET OFFENSES”).

3. The statements contained in this Affidavit are based upon my investigation, interviews conducted by me and other law enforcement officers, documents and records provided by financial institutions and various government agencies, and my experience and training as a Postal Inspector.

4. Because this Affidavit is being submitted for the limited purpose of securing a Criminal Complaint, I have not included each and every fact known to me and have set

forth only the facts that I believe are necessary to establish probable cause to believe that PATRICIA HUTCHINS committed the TARGET OFFENSES.

INITIATION OF INVESTIGATION

5. On or about July 22, 2021, U.S. Postal Inspectors executed a federal search warrant at PATRICIA HUTCHINS' residence in Rochester, New York (hereinafter the "RESIDENCE"). The search warrant resulted in the seizure of documents, cash, and electronic devices that were either used in or derived from various wire fraud schemes, including Unemployment Insurance fraud, Paycheck Protection Program (PPP) loan fraud, and elder fraud. PATRICIA HUTCHINS, the sole adult residing full-time at the residence, was present during the search.

6. On or about September 15, 2022, PATRICIA HUTCHINS was served with a Target Letter, advising her that she was the subject of a federal investigation into various financial crimes.

7. On or about October 31, 2022, HUTCHINS was arrested by Inspectors pursuant to a Criminal Complaint, charging her with violations of Title 18, United States Code, Sections 1341 (Mail Fraud), 1343 (Wire Fraud), and 1356 and 1357 (Money Laundering). Following processing and an Initial Appearance before a U.S. Magistrate, Hutchins was released with various conditions of release, to be supervised by the Federal Probation Department. Those conditions included the requirement that she not commit any offense in violation of federal, state, or local law while on release.

8. On or about May 1, 2024, HUTCHINS appeared before U.S. District Judge,

the Honorable Frank P. Geraci, Jr., and entered a plea of guilty to one count of Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Section 1349. The plea required HUTCHINS to pay restitution to two victims: \$20,052.00 to reimburse a financial institution for a fraudulent PPP loan disbursement that HUTCHINS received; and \$25,100.00 to an elderly individual who had been duped into “paying off a debt for a friend” by sending that money to HUTCHINS. HUTCHINS remained released and under the supervision of the Federal Probation Department pending sentencing.

9. In late August 2024, HUTCHINS sold the RESIDENCE and, on or about September 4, 2024, she received a disbursement of approximately \$95,000.00 representing the equity from her home following the sale. The proceeds were split with HUTCHINS’ ex-husband, leaving her with over \$47,000.00 profit.

10. On or about October 16, 2024, PATRICIA HUTCHINS appeared before Judge Geraci for sentencing. At that appearance, HUTCHINS represented to the Court that she had invested the entire proceeds of her home sale in a retirement account and did not have any money for restitution, as follows:

THE COURT: Okay, and you just sold your house; is that right?

THE DEFENDANT: Yes.

THE COURT: How much did you make on that?

THE DEFENDANT: Um, \$93,000 and I had to give half of it to my ex-husband.

THE COURT: Okay. So it's \$46,000 or so you have.

THE DEFENDANT: Roughly, yeah.

THE COURT: Okay.

THE DEFENDANT: Minus moving expenses and what not.

THE COURT: I'm sorry. What's that?

THE DEFENDANT: Minus moving expenses and things to move and pay the mover and things like that.

THE COURT: Okay. Is there any reason why you couldn't pay up front this restitution, \$45,000?

THE DEFENDANT: Yeah. I'd rather have payments of it.

THE COURT: Well, I'm not going to allow you to have payments, so I'm not giving you a choice.

THE DEFENDANT: Say that again, sir.

THE COURT: Do you have the money to pay the restitution now?

THE DEFENDANT: No, I do not.

THE COURT: Well, you just told me you have \$46,000.

THE DEFENDANT: *Well, I invested that so I don't have it.*

THE COURT: *You invested it?*

THE DEFENDANT: *Well, I got it and I gave half of it to him and I did money and I did -- I put it away for safe keeping.*

THE COURT: Okay. Well, how about taking it out and paying these people the money you owe them?

THE DEFENDANT: I don't know if I can do that because I'm not a 55 and all that stuff.

THE COURT: *So you put it into a retirement account?*

THE DEFENDANT: *A different one, yes.*

THE COURT: Well, it would be a penalty to withdraw it; right?

THE DEFENDANT: Correct, sir.

THE COURT: But you'd still have money to pay. Listen, I think you are a scam artist. Okay? I really do. You did not cooperate with Probation. You would not give them anyone to contact to confirm

everything you had. According to this, you had \$130,000 in equity in your house. You now just told me you made \$90,000. You sold it for \$309,000. Your mortgage was 143. So you must have had more than that than you are telling me. You reported only \$1,100 in income to Probation. You work for Comfort Windows and Doors. You make \$21 an hour. You say full-time so that's 40 hours. That comes out to about \$3,500 a month, not \$1,100 a month. I'm not going to sentence you today because if I did I would send you to jail. Okay? Here's what I'm going to do. I'm going to give you time to get this money together, the restitution, the \$20,000 you owe and the \$25,000 you owe to the two different victims in this case to pay that up front, and then I'll consider what my sentence is going to be. Let's put this off for a month. Even your letter you don't acknowledge responsibility. You really don't. You paint yourself as the victim here. I'll read your letter. One victim talked about having anxiety now because of this. That was the 80-year-old with Parkinson's disease by the way that you defrauded. Well, I too have been diagnosed with anxiety from this ordeal. You created the ordeal. That's why you have a problem. So I'm going to give you the chance to put this money together to consider not sending you to jail.

11. Judge Geraci adjourned sentencing until December 4, 2024, and instructed HUTCHINS that she needed to meet with Probation to provide complete and accurate information about her retirement investment.

12. Pursuant to the Judge's direction, on or about October 31, 2024, HUTCHINS and her attorney met with US Probation Officer ("USPO") Jessica Turman. During this meeting, HUTCHINS represented to USPO Turman that she needed to contact an investment company to inquire how to take out the approximately \$46,000 she had invested. But HUTCHINS was unable to provide the name of the investment company.

13. On or about November 15, 2024, HUTCHINS had another meeting with USPO Turman. During this meeting, USPO Turman asked HUTCHINS if she had any update about her investment account. HUTCHINS represented that she had not yet called the investment company to ask how much of a penalty it would be to make a withdrawal.

14. As a result of these meetings, Probation issued a Revised PSR that included an investment account containing \$47,311.29 in HUTCHINS' list of assets.

15. On or about December 4, 2024, HUTCHINS appeared once again before Judge Geraci for sentencing. This time, HUTCHINS, through her attorney, advised the court that she had given all of her money to an individual whom she believed to be country music recording artist Kenny Chesney, who had agreed to invest it for her. The exchange went as follows:

THE COURT:

Okay. This matter is on for sentencing. The Court has received an amended revised presentence report. This was adjourned from an earlier date in order to give the defendant an opportunity to come to Court with sufficient funds to pay the restitution in this matter. Mr. Ciccone?

MR. CICCONE:

Judge, we've been working towards that. Unfortunately, it seems that this money has been turned over to the same people that were scamming Ms. Hutchins to begin with. We've been referring to this person as Kenny Chesney. Obviously, it's not really the singer Kenny Chesney, but that's just the name that the person is known by.

It appears that this person reached out to Ms. Hutchins after she sold her house. I don't know how they knew that she had sold her house, but somehow they found out, reached out to her again. Ms. Hutchins thought she was rekindling

the relationship with Kenny Chesney. He then indicated to her that he would help her put the money away in an investment for retirement, so the money ended up going back to this person that we're calling Kenny Chesney. Obviously, any efforts to try to recover the money so that it could be paid towards restitution have been fruitless.

16. As a result, Judge Geraci took HUTCHINS into custody and further adjourned her sentencing.

PATRICIA HUTCHINS AND “KENNY CHESNEY”

17. HUTCHINS had already used this excuse—that she was scammed by a person whom she believed was Kenny Chesney—twice before.

18. The first instance was in June 2019, when investigators from the Gates Police Department (“Gates PD”) received a complaint from the Gates Chili Federal Credit Union (“GCFCU”) that HUTCHINS had “floated” multiple payments against the balance of her GCFCU credit card.

19. A “floated” payment is a payment against a credit card balance which is initially credited to the account, lowering the balance due and allowing for additional immediate purchases, but which ultimately fails to clear. For example, if someone owes \$2,000.00 on a credit card with a \$2,000.00 spending limit, and they make a payment of \$1,000.00 against the account, the credit card company generally makes \$1,000.00 in credit available to the accountholder. If the accountholder immediately uses the credit card to make a \$1,000.00 purchase, and then the original \$1,000.00 payment fails to go through for any reason, the accountholder has successfully obtained \$3,000.00 in purchases against a

\$2,000.00 credit limit.

20. In the case of HUTCHINS' GCFCU credit card account, she had floated or attempted to float over \$82,000.00 in payments against her \$2,400.00 credit card account, successfully obtaining over \$25,000.00 worth of purchases in just a couple of months. The majority of the floated payments were not from accounts owned by HUTCHINS; most payments were made from the checking accounts of real people other than HUTCHINS. These people were victims of fraud whose accounts had been illegally accessed. That is why the payments were ultimately returned by GCFCU.

21. When HUTCHINS was interviewed by investigators from Gates PD, HUTCHINS said she was in an online relationship with country music star Kenny Chesney, and she was buying gift cards for him with her GCFCU credit card. HUTCHINS said Chesney had made all of the floated payments to her credit card account, allowing her to spend approximately \$25,000.00 on Wal-Mart, Home Depot, and Best Buy gift cards for him.

22. Gates PD investigators advised HUTCHINS she was participating in a scam. She was told she was not actually communicating with Kenny Chesney, but rather, someone posing as him. She was told that the payments to her credit card account were not from Chesney, but rather, from the checking accounts of victims. Gates PD investigators educated HUTCHINS on the pitfalls of only knowing someone online. Because, at the time, Gates PD believed HUTCHINS' representation that she was a victim and not a co-conspirator, she was not charged with floating the credit card payments at GCFCU.

23. The second time HUTCHINS attempted to use "Kenny Chesney" as an

excuse for her criminal behavior was at the outset of this investigation, during the execution of the search warrant at her residence in July 2021. I personally advised HUTCHINS of the risks of engaging with people online, whom she didn't truly know in person. HUTCHINS was advised that her involvement in Unemployment Insurance benefit, PPP loan, and elder frauds, and the nature of how HUTCHINS was communicating with people and receiving and moving funds between accounts, had all of the earmarks of scams perpetrated exclusively through online relationships.

24. HUTCHINS ultimately pled guilty to conspiring to commit wire fraud with the individual whom she claimed to believe was Kenny Chesney. During her plea colloquy, under oath, she admitted that he was a co-conspirator.

25. Based on the above and my knowledge of this investigation, I respectfully submit that there is no way HUTCHINS believed that she was working with Kenny Chesney or a benevolent third party. I respectfully submit that, at latest on the date of her plea hearing, HUTCHINS knew that the person she identified as "Kenny Chesney" was continuously engaged in internet-based fraud schemes and that HUTCHINS was knowingly participating in those schemes with him.

26. Thus, following HUTCHINS' representations to Judge Geraci, first, that she invested the proceeds of the sale of the RESIDENCE in a retirement account and, second, that she transferred the funds to "Kenny Chesney" for him to invest, an investigation was opened. This investigation included the collection and review of HUTCHINS' financial statements.

HUTCHINS' DISPOSITION OF THE SALE PROCEEDS

27. According to records obtained from Five Star Bank, the proceeds of the sale of the RESIDENCE were deposited into HUTCHINS' account on or about September 4, 2024—approximately one month before her scheduled sentencing on October 16, 2024.

28. Then, in the month leading up to the sentencing, between September 5, 2024 and October 16, 2024, HUTCHINS pulled approximately \$15,000.00 of the sale proceeds out of the account by making numerous \$250.00 purchases at merchants such as Walgreens, Tops, Wegman's, Lowe's, Home Depot, etc., as follows:

Posted	EFT Description	Amount
9/4/2024	WIRE TRANSFER CREDIT	\$95,021.79
9/5/2024	POS DEB 2020 09/04/24 20226224 WALGREENS 665 LONG PON 665 LONG POND RD ROCHESTER NY C#3030	-\$109.72
9/6/2024	DBT CRD 1837 09/05/24 DJFE2KJH WEGMANS #020 ROCHESTER NY C#3030	-\$250.00
9/6/2024	DBT CRD 1829 09/05/24 DJCEO9N TOPS MARKETS #418 GREECE NY C#3030	-\$250.00
9/6/2024	DBT CRD 1817 09/05/24 DJSSI3JH WALGREENS #10546 ROCHESTER NY C#3030	-\$250.00
9/6/2024	DBT CRD 1753 09/05/24 DJRZ23JH WALGREENS #19978 ROCHESTER NY C#3030	-\$250.00
9/6/2024	DBT CRD 1635 09/05/24 DJI2L1H4 CVS/PHARMACY #02217 GREECE NY C#3030	-\$108.10
9/6/2024	POS DEB 2008 09/05/24 20000059 WEGMANS # 3177 LATTA R 3177 LATTA RD ROCHESTER NY C#3030	-\$250.00
9/6/2024	POS DEB 1952 09/05/24 19500115 WEGMANS # 2833 RIDGE R 2833 RIDGE ROAD W ROCHESTER NY C#3030	-\$250.00
9/9/2024	POS DEB 1440 09/08/24 14400072 WEGMANS # 3177 LATTA R 3177 LATTA RD ROCHESTER NY C#3030	-\$295.61
9/9/2024	POS DEB 1310 09/08/24 00043472 TOPS MARKETS #418 3507 TOPS MARKETS 418 GREECE NY C#3030	-\$265.60
9/9/2024	POS DEB 1921 09/06/24 19200018 WEGMANS # 3177 LATTA R 3177 LATTA RD ROCHESTER NY C#3030	-\$251.11
9/9/2024	POS DEB 1542 09/08/24 15799546 LOWE S #1655 LOWE S 1655 ROCHESTER NY C#3030	-\$250.00
9/9/2024	POS DEB 1325 09/08/24 13254330 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER NY C#3030	-\$250.00
9/9/2024	POS DEB 1255 09/08/24 12533829 WALGREENS 3535 MOUNT R 3535 MOUNT READ BL ROCHESTER NY C#3030	-\$250.00
9/9/2024	POS DEB 1220 09/08/24 12200054 WEGMANS # 2301 LYELL A 2301 LYELL AVENUE ROCHESTER NY C#3030	-\$250.00
9/9/2024	POS DEB 1642 09/07/24 16424647 CVS/PHARM 05076--84 SO 05076--84 SOUTH AV HILTON NY C#3030	-\$250.00
9/9/2024	POS DEB 1545 09/07/24 15400093 WEGMANS # 2833 RIDGE R 2833 RIDGE ROAD W ROCHESTER NY C#3030	-\$250.00
9/9/2024	POS DEB 1526 09/07/24 15928267 LOWE S #1655 LOWE S 1655 ROCHESTER NY C#3030	-\$250.00
9/9/2024	POS DEB 1454 09/07/24 14523989 CVS/PHARM 05123--6524 05123--6524 BROCKP BROCKPORT NY C#3030	-\$250.00
9/9/2024	POS DEB 1355 09/07/24 13564130 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT NY C#3030	-\$250.00
9/9/2024	POS DEB 1933 09/06/24 19319101 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER NY C#3030	-\$250.00
9/9/2024	POS DEB 1655 09/06/24 16511600 WALGREENS 430 SPENCER 430 SPENCERPORT RD ROCHESTER NY C#3030	-\$250.00
9/9/2024	POS DEB 1641 09/06/24 00091093 TOPS MARKETS #403 2345 TOPS MARKETS 403 GATES NY C#3030	-\$250.00
9/10/2024	Transfer to Ex-Husband	-\$47,710.50
9/10/2024	POS DEB 1302 09/10/24 13000063 WEGMANS # 3175 CHILI A 3175 CHILI AVE ROCHESTER NY C#3030	-\$250.00

9/12/2024	POS DEB 1903 09/11/24 19049292 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT	NY C#3030	-\$271.58
9/12/2024	POS DEB 1837 09/11/24 18300019 WEGMANS # 2833 RIDGE R 2833 RIDGE ROAD W ROCHESTER	NY C#3030	-\$250.00
9/16/2024	POS DEB 1724 09/15/24 17200103 WEGMANS # 3177 LATTA R 3177 LATTA RD ROCHESTER	NY C#3030	-\$253.84
9/16/2024	POS DEB 1638 09/15/24 16013076 LOWE S #2434 LOWE S 2434 BROCKPORT	NY C#3030	-\$250.00
9/16/2024	POS DEB 1948 09/14/24 19400095 WEGMANS # 3177 LATTA R 3177 LATTA RD ROCHESTER	NY C#3030	-\$250.00
9/16/2024	POS DEB 1919 09/14/24 19108897 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER	NY C#3030	-\$250.00
9/17/2024	POS DEB 1809 09/16/24 18010436 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER	NY C#3030	-\$257.55
9/17/2024	POS DEB 1307 09/17/24 00058963 DOLLARTREE DOLLARTREE ROCHESTER	NY C#3030	-\$252.75
9/17/2024	POS DEB 1740 09/16/24 00048880 DOLLAR TREE DOLLAR TREE ROCHESTER	NY C#3030	-\$251.94
9/17/2024	POS DEB 1752 09/16/24 17508420 CVS/PHARM 02217--LONG 02217--LONG POND R GREECE	NY C#3030	-\$250.00
9/17/2024	POS DEB 1733 09/16/24 17230945 LOWE S #1655 LOWE S 1655 ROCHESTER	NY C#3030	-\$250.00
9/18/2024	POS DEB 1720 09/17/24 00051236 DOLLAR TREE DOLLAR TREE ROCHESTER	NY C#3030	-\$254.05
9/18/2024	POS DEB 1651 09/17/24 00060872 DOLLAR TREE DOLLAR TREE ROCHESTER	NY C#3030	-\$252.60
9/18/2024	POS DEB 1727 09/17/24 17138667 LOWE S #1655 LOWE S 1655 ROCHESTER	NY C#3030	-\$250.00
9/20/2024	POS DEB 1907 09/19/24 19002670 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER	NY C#3030	-\$203.49
9/23/2024	POS DEB 1813 09/20/24 00043846 DOLLAR TREE DOLLAR TREE ROCHESTER	NY C#3030	-\$275.25
9/23/2024	POS DEB 1755 09/20/24 17044335 LOWE S #1655 LOWE S 1655 ROCHESTER	NY C#3030	-\$266.18
9/23/2024	POS DEB 1258 09/23/24 00024804 DOLLARTREE DOLLARTREE ROCHESTER	NY C#3030	-\$259.40
9/23/2024	POS DEB 1652 09/21/24 00036063 DOLLAR TREE DOLLAR TREE ROCHESTER	NY C#3030	-\$250.00
9/23/2024	POS DEB 1640 09/21/24 16472484 LOWE S #1655 LOWE S 1655 ROCHESTER	NY C#3030	-\$250.00
9/23/2024	ATM W/D 1855 09/21/24 007220 WALGREENS -G 665 LONG POND RO ROCHESTER GRE NY C#3030		-\$120.00
9/24/2024	POS DEB 1727 09/23/24 17200050 WEGMANS # 2833 RIDGE R 2833 RIDGE ROAD W ROCHESTER	NY C#3030	-\$309.15
9/24/2024	POS DEB 1746 09/23/24 00042814 DOLLAR TREE DOLLAR TREE ROCHESTER	NY C#3030	-\$256.75
9/24/2024	POS DEB 1737 09/23/24 17100125 LOWE S #1655 LOWE S 1655 ROCHESTER	NY C#3030	-\$251.00

9/27/2024	POS DEB 2015 09/26/24 20100095 WEGMANS # 2833 RIDGE R 2833 RIDGE ROAD W ROCHESTER	NY C#3030	-\$328.17
9/27/2024	POS DEB 2025 09/26/24 00052375 DOLLAR TREE DOLLAR TREE ROCHESTER	NY C#3030	-\$254.05
9/27/2024	POS DEB 1702 09/26/24 00043672 DOLLAR TREE DOLLAR TREE ROCHESTER	NY C#3030	-\$250.00
9/27/2024	POS DEB 1653 09/26/24 00048809 DOLLAR TREE DOLLAR TREE ROCHESTER	NY C#3030	-\$250.00
9/30/2024	DBT CRD 1745 09/29/24 DJSWIRZT WEGMANS #065 BROCKPORT	NY C#3030	-\$276.82
9/30/2024	POS DEB 1951 09/28/24 19110796 LOWE S #2434 LOWE S 2434 BROCKPORT	NY C#3030	-\$251.00
9/30/2024	POS DEB 1821 09/29/24 18994733 LOWE S #2434 LOWE S 2434 BROCKPORT	NY C#3030	-\$250.00
9/30/2024	POS DEB 1012 09/29/24 00017179 DOLLAR GENERAL #19224 DOLLAR GENERAL 19 GREECE	NY C#3030	-\$250.00
9/30/2024	POS DEB 1959 09/28/24 00060411 DOLLAR TREE DOLLAR TREE BROCKPORT	NY C#3030	-\$250.00
10/3/2024	POS DEB 1845 10/02/24 18447485 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT	NY C#3030	-\$250.00
10/3/2024	POS DEB 1750 10/02/24 17819852 LOWE S #2434 LOWE S 2434 BROCKPORT	NY C#3030	-\$250.00
10/3/2024	POS DEB 1733 10/02/24 17361934 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT	NY C#3030	-\$250.00
10/3/2024	POS DEB 1831 10/02/24 18300119 WEGMANS # 6660 FOURTH 6660 FOURTH SECTIO BROCKPORT	NY C#3030	-\$247.90
10/4/2024	POS DEB 1801 10/03/24 18036917 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT	NY C#3030	-\$250.00
10/4/2024	POS DEB 1727 10/03/24 17224064 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT	NY C#3030	-\$250.00
10/4/2024	POS DEB 1715 10/03/24 17110201 WALGREENS 4366 BUFFALO 4366 BUFFALO RD NORTH CHILI	NY C#3030	-\$250.00
10/7/2024	POS DEB 1821 10/06/24 18205112 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT	NY C#3030	-\$262.94
10/7/2024	POS DEB 1714 10/04/24 17163309 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT	NY C#3030	-\$257.55
10/7/2024	POS DEB 1804 10/04/24 18033617 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT	NY C#3030	-\$252.40
10/7/2024	POS DEB 1837 10/06/24 18325876 CVS/PHARM 05123--6524 05123--6524 BROCKP BROCKPORT	NY C#3030	-\$250.00
10/7/2024	POS DEB 1757 10/06/24 17554657 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT	NY C#3030	-\$250.00
10/7/2024	POS DEB 1658 10/04/24 97827357 RITE AID 10850 4374 BUFFALO ROAD NORTH CHILI	NY C#3030	-\$250.00
10/7/2024	POS DEB 1654 10/04/24 16549191 WALGREENS 4366 BUFFALO 4366 BUFFALO RD NORTH CHILI	NY C#3030	-\$250.00
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10/9/2024	POS DEB 1702 10/08/24 97824269 RITE AID 10850 4374 BUFFALO ROAD NORTH CHILI	NY C#3030	-\$250.00

10/9/2024	POS DEB 1655 10/08/24 16501094 WALGREENS 4366 BUFFALO 4366 BUFFALO RD NORTH CHILI NY C#3030	-\$250.00
10/10/2024	POS DEB 1815 10/09/24 18140094 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT NY C#3030	-\$250.00
10/10/2024	POS DEB 1749 10/09/24 17405229 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER NY C#3030	-\$250.00
10/10/2024	POS DEB 1739 10/09/24 17304827 WALGREENS 3535 MOUNT R 3535 MOUNT READ BL ROCHESTER NY C#3030	-\$250.00
10/10/2024	POS DEB 1652 10/09/24 16539605 WALGREENS 430 SPENCER 430 SPENCERPORT RD ROCHESTER NY C#3030	-\$250.00
10/15/2024	POS DEB 1051 10/13/24 10530818 WALGREENS 665 LONG PON 665 LONG POND RD ROCHESTER NY C#3030	-\$253.55
10/15/2024	POS DEB 1141 10/13/24 11451236 WALGREENS 430 SPENCER 430 SPENCERPORT RD ROCHESTER NY C#3030	-\$250.00
10/15/2024	POS DEB 1121 10/13/24 11221040 WALGREENS 3535 MOUNT R 3535 MOUNT READ BL ROCHESTER NY C#3030	-\$250.00
10/15/2024	POS DEB 1110 10/13/24 11138284 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER NY C#3030	-\$250.00
10/15/2024	POS DEB 1709 10/11/24 17064967 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT NY C#3030	-\$250.00
10/15/2024	POS DEB 1658 10/11/24 16551469 WALGREENS 4366 BUFFALO 4366 BUFFALO RD NORTH CHILI NY C#3030	-\$250.00
10/15/2024	POS DEB 1108 10/13/24 11031721 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER NY C#3030	-\$40.00
10/16/2024	POS DEB 1805 10/15/24 18000065 WEGMANS # 6660 FOURTH 6660 FOURTH SECTIO BROCKPORT NY C#3030	-\$269.95

29. Based on my training, experience, and knowledge of this investigation, I believe these series of approximately \$250 expenditures represent gift card purchases.

30. Even after the sentencing was adjourned the first time, from October 17, 2024, through November 29, 2024, and she was expressly directed to gather funds to pay restitution, HUTCHINS continued to disperse the proceeds of her sale of the RESIDENCE by making regular gift card purchases totaling approximately \$8,500.00, as follows:

Posted	EFT Description	Amount
10/17/2024	POS DEB 1742 10/16/24 17444611 WALGREENS 665 LONG PON 665 LONG POND RD ROCHESTER NY C#3030	-\$250.00
10/17/2024	POS DEB 1730 10/16/24 17323899 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER NY C#3030	-\$250.00
10/17/2024	POS DEB 1719 10/16/24 17109724 WALGREENS 3535 MOUNT R 3535 MOUNT READ BL ROCHESTER NY C#3030	-\$250.00
10/17/2024	POS DEB 1658 10/16/24 16555128 WALGREENS 430 SPENCERP 430 SPENCERPORT RD ROCHESTER NY C#3030	-\$250.00
10/21/2024	POS DEB 1048 10/20/24 10400017 WEGMANS # 2833 RIDGE R 2833 RIDGE ROAD W ROCHESTER NY C#3030	-\$260.75
10/21/2024	POS DEB 1102 10/20/24 11045844 WALGREENS 3535 MOUNT R 3535 MOUNT READ BL ROCHESTER NY C#3030	-\$260.32
10/21/2024	POS DEB 1240 10/19/24 12417954 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT NY C#3030	-\$256.47
10/21/2024	POS DEB 1115 10/20/24 11133316 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER NY C#3030	-\$256.03
10/21/2024	POS DEB 1125 10/20/24 11216678 WALGREENS 665 LONG PON 665 LONG POND RD ROCHESTER NY C#3030	-\$254.08
10/21/2024	POS DEB 1817 10/18/24 18100051 WEGMANS # 6660 FOURTH 6660 FOURTH SECTIO BROCKPORT NY C#3030	-\$250.00
10/21/2024	POS DEB 1718 10/18/24 17143744 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT NY C#3030	-\$250.00
10/21/2024	POS DEB 1650 10/18/24 16539074 WALGREENS 430 SPENCERP 430 SPENCERPORT RD ROCHESTER NY C#3030	-\$250.00
10/23/2024	POS DEB 1914 10/22/24 19100088 WEGMANS # 6660 FOURTH 6660 FOURTH SECTIO BROCKPORT NY C#3030	-\$250.00
10/23/2024	POS DEB 1907 10/22/24 19000047 CVS/PHARM 05123--6524 05123--6524 BROCKP BROCKPORT NY C#3030	-\$250.00
10/24/2024	POS DEB 1727 10/23/24 17222260 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT NY C#3030	-\$250.00
10/24/2024	POS DEB 1651 10/23/24 16514221 WALGREENS 430 SPENCERP 430 SPENCERPORT RD ROCHESTER NY C#3030	-\$250.00
10/28/2024	POS DEB 1747 10/27/24 17400037 WEGMANS # 6660 FOURTH 6660 FOURTH SECTIO BROCKPORT NY C#3030	-\$289.23
10/28/2024	POS DEB 1803 10/25/24 18000093 WEGMANS # 6660 FOURTH 6660 FOURTH SECTIO BROCKPORT NY C#3030	-\$267.38
10/28/2024	POS DEB 1711 10/25/24 17137750 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT NY C#3030	-\$254.49
10/28/2024	POS DEB 1758 10/27/24 17500347 CVS/PHARM 05123--6524 05123--6524 BROCKP BROCKPORT NY C#3030	-\$250.00
10/28/2024	POS DEB 1722 10/27/24 17243876 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT NY C#3030	-\$250.00
10/28/2024	POS DEB 1743 10/25/24 17442415 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT NY C#3030	-\$250.00
10/28/2024	POS DEB 1655 10/25/24 16533294 WALGREENS 430 SPENCERP 430 SPENCERPORT RD ROCHESTER NY C#3030	-\$250.00
11/1/2024	POS DEB 1654 10/31/24 16533484 WALGREENS 430 SPENCERP 430 SPENCERPORT RD ROCHESTER NY C#3030	-\$279.95
11/1/2024	POS DEB 1728 10/31/24 17242503 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT NY C#3030	-\$250.00

11/4/2024	POS DEB 1213 11/02/24 12147004 WALGREENS 4433 DEWEY A 4433 DEWEY AVE ROCHESTER	NY C#3030	-\$250.00
11/4/2024	POS DEB 1202 11/02/24 12030974 WALGREENS 3535 MOUNT R 3535 MOUNT READ BL ROCHESTER	NY C#3030	-\$250.00
11/4/2024	POS DEB 1500 11/02/24 15000033 WEGMANS # 6660 FOURTH 6660 FOURTH SECTIO BROCKPORT	NY C#3030	-\$249.00
11/8/2024	POS DEB 1758 11/07/24 17500907 CVS/PHARM 05123--6524 05123--6524 BROCKP BROCKPORT	NY C#3030	-\$100.00
11/8/2024	POS DEB 1738 11/07/24 17354432 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT	NY C#3030	-\$100.00
11/8/2024	POS DEB 1716 11/07/24 17111109 WALGREENS 665 LONG PON 665 LONG POND RD ROCHESTER	NY C#3030	-\$100.00
11/19/2024	POS DEB 1748 11/18/24 17401457 CVS/PHARM 05123--6524 05123--6524 BROCKP BROCKPORT	NY C#3030	-\$121.05
11/19/2024	POS DEB 1726 11/18/24 17246062 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT	NY C#3030	-\$100.00
11/19/2024	POS DEB 1701 11/18/24 97821173 RITE AID 10850 4374 BUFFALO ROAD NORTH CHILI	NY C#3030	-\$100.00
11/21/2024	DBT CRD 1821 11/20/24 DJPLV4VC WEGMANS #065 BROCKPORT	NY C#3030	-\$100.00
11/21/2024	POS DEB 1909 11/20/24 19062423 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT	NY C#3030	-\$100.00
11/25/2024	POS DEB 1656 11/22/24 16561671 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT	NY C#3030	-\$122.66
11/25/2024	POS DEB 1721 11/22/24 17220697 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT	NY C#3030	-\$112.95
11/29/2024	POS DEB 1719 11/27/24 17115682 WALGREENS 73 N MAIN ST 73 N MAIN ST BROCKPORT	NY C#3030	-\$250.00
11/29/2024	POS DEB 1650 11/27/24 16563454 WALGREENS 2841 NICHOLS 2841 NICHOLS ST SPENCERPORT	NY C#3030	-\$250.00

31. As of November 29, 2024, there was only approximately \$1,000 left in this account.

32. There were no withdrawals from HUTCHINS' account between the deposit of the home sale proceeds on or about September 4, 2024, and her second sentencing hearing on or about December 4, 2024, that resemble a transfer of funds to any kind of investment account.

ADDITIONAL CREDIT CARD FRAUD

33. In the course of investigating HUTCHINS' misrepresentations to Judge Geraci and USPO Turman, Your Affiant found evidence that HUTCHINS held two additional credit card accounts that were closed due to suspected fraud during late 2022 and early 2023. Records for both accounts were obtained and reviewed.

34. HUTCHINS opened an OLLO Card credit card account, with credit card account ending 6474, through Ally Bank in April 2021. The account had a \$1,000.00 credit limit. Between April and December 2021, HUTCHINS used the card for everyday household purchases, maintaining a balance below the \$1,000.00 limit.

35. In January 2022, the credit limit for HUTCHINS' OLLO card 6474 was increased to \$3,100.00, and by March 2022, the balance owed on the account was in excess of \$3,000.00.

36. Between April and September 2022, HUTCHINS made small monthly payments against the balance due on OLLO card 6474, and coupled with the monthly interest, still had a balance due in excess of \$3,000.00.

37. In October 2022, HUTCHINS had three payments, totaling \$7,290.19, credited against her OLLO card 6474 credit card account balance. All three payments ultimately failed:

- a. On October 4, 2022, HUTCHINS made a payment of \$3,025.72 using her own Five Star Bank checking account ending 0782. Between October 6 and October 7, 2022, HUTCHINS appeared to purchase five gift cards, totaling \$1,200.00, from various Walgreens and Tops stores. As the balance available in her Five Star Bank checking account 0782 on October 4, 2022 had only been \$1,220.94, her floated payment failed. Following the subsequent gift card purchases, HUTCHINS owed over \$4,000.00 on her \$3,100.00 OLLO card 6474 credit card account.
- b. On October 10, 2022, a payment of \$3,025.72 was received against the balance due on HUTCHINS' OLLO card 6474 credit card account, from M&T Bank checking account ending 8162.
- c. On October 11, 2022, a payment of \$1,238.75 was received against the balance due on HUTCHINS' OLLO card 6474 credit card account, also from M&T Bank checking account ending 8162. Shortly thereafter, both M&T Bank checking account 8162 payments were returned to M&T Bank due to fraud. M&T Bank checking account 8162 was found to belong to a Rochester, New York based non-profit society.

38. On or about October 31, 2022, the same date HUTCHINS was arrested by Postal Inspectors, charged with felony Mail, Wire and Money Laundering violations,

HUTCHINS' OLLO credit card account 6474 was closed by Ally Bank due to fraud, with an outstanding balance due of \$4,969.47, which included \$4,221.47 in charges and \$748.00 in fees against a \$3,100.00 credit limit.

39. HUTCHINS also opened a Mission Lane LLC (MLL) credit card account with credit card ending 1663 through Transportation Alliance Bank (TAB) on or about December 16, 2021. The account had a \$1,000.00 credit limit. HUTCHINS did not use the credit card until on or about February 4, 2022, when she made two, \$500.00 purchases from two different Walgreens stores.

40. Between March and September 2022, despite MLL credit card account 1663 being maxed out, HUTCHINS made only one payment of \$81.77 against the balance due: on or about April 11, 2022, HUTCHINS made a payment of \$81.77 using her own Five Star Bank checking account ending 1324. On April 14, 2022, the payment failed. By August 15, 2022, due to monthly interest charges, HUTCHINS owed a total of \$1,268.29 on her MLL credit card 1663 with a \$1,000 limit.

41. On or about August 26, 2022, a payment of \$900.00 was received against the balance due on HUTCHINS' MLL credit card account 1663, from Santander Bank checking account ending 0752. On or about October 22, 2022, this payment was reversed.

42. On or about September 20, 2022, a payment of \$384.47 was received against the balance due on HUTCHINS' MLL credit card account 1663, from Bank of America checking account ending 2261. On September 22, 2022, this payment was reversed.

43. While these two payments were pending and before they were reversed, on or

about September 24, 2022, HUTCHINS appeared to purchase two, \$100 gift cards at two different Tops stores locations.

44. As set forth above, on or about October 31, 2022, HUTCHINS was arrested and placed on federal supervised release with the condition that she not violate any federal, state, or local law.

45. Nonetheless, between on or about September 26, 2022 through in or around the end of February 2023, HUTCHINS' MLL credit card 1663 with a credit limit of \$1,000 used fraudulent floated payments against the account to obtain over \$16,000 worth of suspected gift cards, resulting in equivalent losses to Ally Bank and a second victim financial institution.

46. The chart below summarizes the activity on HUTCHINS' MLL credit card 1663 account between September 24, 2022 and the closing of the account by ALLY Bank in April 2023. To better illustrate the flow, purchases are in standard form and payments are *italicized*.

<u>DATE</u>	<u>ACTIVITY</u>	<u>AMOUNT</u>
9/24/2022	Tops, Walgreens purchases	\$200.00
9/26/2022	<i>Payment from Truist Bank checking account xxxxxx8416</i>	\$584.47
9/27/2022	2 Walgreens purchases	\$400.00
9/29/2022	<i>Payment from Truist Bank checking account xxxxxx8416</i>	\$400.00
10/3/2022	Tops, Walgreens and CVS purchases	\$600.00
10/5/2022	<i>Payment from Truist Bank checking account xxxxxx8416</i>	\$591.00
10/6/2022	Tops and Walgreens purchases	\$400.00
10/8/2022	<i>Payment from Truist Bank checking account xxxxxx8416</i>	\$400.00
10/12/2022	Tops, 2 Walgreens purchases	\$600.00
10/14/2022	<i>Payment from Truist Bank checking account xxxxxx8416</i>	\$600.00
10/15/2022	2 Tops, 4 Wegmans and CVS purchases	\$1,000.00
10/17/2022	<i>Payment from Truist Bank checking account xxxxxx8416</i>	\$1,000.00
10/22/2022	8/26/2022 payment from Santander Bank xxxxxx0752	\$900.00

	<i>REVERSED</i>	
10/24/2022	Walgreens purchase	\$100.00
10/24/2022	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$900.00
10/31/2022	HUTCHINS arrested by Postal Inspectors	
11/1/2022	2 Wegman's, 4 Walgreens purchases	\$900.00
11/3/2022	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$959.50
11/10/2022	3 Walgreens, 1 CVS purchase	\$1,000.00
11/11/2022	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$1,000.00
11/18/2022	2 Walgreens purchases	\$1,000.00
11/20/2022	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$1,000.00
11/27/2022	2 Walgreens purchases	\$1,000.00
11/29/2022	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$1,000.00
12/6/2022	2 Walgreens purchases (1 returned)	\$500.00
12/8/2022	Walgreens purchase	\$50.00
12/8/2022	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$941.50
12/9/2022	Walgreens purchase	\$500.00
12/10/2022	Walgreens purchase	\$500.00
12/15/2022	Wegmans, 2 Walgreens, 2 CVS purchases	\$950.00
12/17/2022	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$1,000.00
12/24/2022	2 Walgreens purchases	\$1,000.00
12/26/2022	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$1,000.00
1/2/2023	2 Walgreens purchases	\$1,000.00
1/4/2023	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$955.00
1/11/2023	4 Walgreens purchases	\$1,000.00
1/13/2023	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$1,000.00
1/20/2023	4 Walgreens purchases	\$1,000.00
1/22/2023	<i>Payment from Truist Bank checking account xxxxxxx8416</i>	\$1,000.00
1/29/2023	1 Tops, 2 Walgreens, 1 Wegman's purchase	\$1,000.00
1/31/2023	<i>Payment attempted and immediately reversed</i>	\$1,000.00
2/5/2023	<i>Payment attempted and immediately reversed</i>	\$940.00
2/10/2022	<i>Payment attempted and immediately reversed</i>	\$940.00
2/12/2022	Wegman's purchase	\$50.00
2/15- 2/28/2022	<i>11 payments from Truist Bank checking account xxxxxxx8416</i> REVERSED	\$10,254.50
4/14/2023	Mission Lane LLC Account 1663 closed by Ally Bank	-\$10,896.31

47. Between September 26, 2022 and January 22, 2023, 17 payments from Truist Bank checking account xxxxxxx8416 were processed against HUTCHINS' MLL credit card 1663 account. The payments totaled \$14,331.47 and directly allowed HUTCHINS to purchase over \$15,000.00 worth of suspected gift cards.

48. Truist Bank checking account xxxxxx8416 is a personal account belonging to K.M.W. and J.G.W. of Savannah, Georgia. K.M.W. and J.G.W. disputed the 17 payments totaling \$14,331.47 with Truist Bank as fraud. Truist ruled in K.M.W.'s and J.G.W.'s favor, crediting them the full amount of the fraud.

CONCLUSION

49. Since at least 2019, PATRICIA HUTCHINS has been continually involved in various financial frauds, involving the compromising of numerous individuals' personally identifying information and several bank accounts, resulting in thousands of dollars in losses to financial institutions.

50. HUTCHINS has often claimed that she committed these crimes under the direction of a person she believed to be country music recording artist Kenny Chesney, despite being told by numerous law enforcement agents that she is not in communication or a relationship with Chesney, but rather, a person only claiming to be Chesney online.

51. Despite being advised of her rights and the potential penalty of being charged with additional offenses if not truthful, HUTCHINS misrepresented to USPO Turman that she had invested the proceeds of the sale of her RESIDENCE in a retirement account when, in truth, she had systematically dispersed those proceeds by purchasing gift cards.

52. Further, despite being on federal supervised release stemming from her arrest for allegedly committing numerous financial crimes, HUTCHINS floated fraudulent payments against two, \$1,000.00 limit credit card accounts to conduct over \$20,000.00 in purchases, the majority of which are suspected of having been gift cards, resulting in losses

to financial institutions of over \$20,000.00.

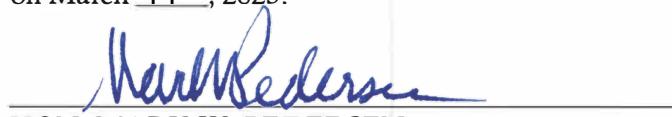
53. The actions of PATRICIA HUTCHINS constitute violations of Title 18, United States Code, Section 1001 (Making a False Statement), and Title 18, United States Code, Section 1344 (Bank Fraud).

54. Based on the forgoing, I respectfully submit that there is probable cause to believe that PATRICIA HUTCHINS did knowingly commit the TARGET OFFENSES. It is respectfully requested, based upon the above information, that this court issue a Criminal Complaint for PATRICIA HUTCHINS.



Clinton E. Homer
Postal Inspector
United States Postal Inspection Service

Affidavit submitted electronically by email in .pdf format. Oath administered and contents and signature attested to me and before me as true and accurate telephonically pursuant to Fed. R. Crim. P. 4.1 and 4(d) on March 14, 2025.



HON. MARK W. PEDERSEN
United States Magistrate Judge